ORIGINAL
FILE

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of

Amendment of Parts 2 and 97 of the Commission's Rules Regarding an Allocation of the 216-220 MHz Band for the Amateur Service

RM-7747

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OCT 23 1991

Federal Communications Commission
Office of the Secretary

To: The Commission

COMMENTS ON PETITION FOR RULE MAKING

VALLEY EMERGENCY RADIO ASSOCIATION
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President

October 19, 1991

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SUMMARY

The Valley Emergency Radio Association (VERA) wishes to endorse the proposals presented in the Proposal for Rulemaking submitted by the American Radio Relay League, and request the Commission to take prompt action on this matter. We believe that serious damage has been inflicted upon the Amateur Packet Radio network (and other Amateur Radio operations) as a result of the actions taken in Docket 87-14 and that secondary use of the 216 - 220 MHz Band will assist in alleviating some of that damage.

VERA is a public service oriented Amateur Radio organization based in Southern California. We have been active in supporting the emerging Amateur Packet Radio network for over five years and currently operate several network resource stations on the 222 - 225 MHz Amateur Band. Prior to the loss of the 220 - 222 MHz segment we were active in providing trunking facilities using those frequencies and the loss of that spectrum has had a very adverse effect on our ability to provide those services.

GENERAL

The Valley Emergency Radio Association (VERA) is a NOT-FOR-PROFIT Association registered in the State of California. The purpose of the Association is to provide financial support for Amateur Radio facilities and services intended primarily for public service purposes. A demonstrated interest in supporting the public service aspects of Amateur Radio is a requisite for membership in the organization. In addition to voice repeater and remote base services on the 2M and 1.25M Bands, VERA (in conjunction with K6IYK as a private individual) is very active in supporting Amateur Packet Radio facilities in Los Angeles, Orange, and Ventura Counties.

HISTORY

K6IYK and VERA have actively used the 1.25M Band in providing packet services since they joined with the W6AMT group from Northern California in the installation of a packet backbone trunk tying the Northern and Southern portions of the State together. The first public 220 MHz Node in Los Angeles was installed by K6IYK and supported by VERA. This facility allowed the newly franchised Novice packeteer to learn about bulletin board services and participate in public service events on par with individuals holding higher class licenses.

Implementation of frequency diversity techniques became very important as packet activity in the Los Angeles area increased at a rapid rate. VERA was the first to install multi-port Network Nodes (HUBS) which used frequencies in both the bottom and top halves of the 1.25M Band. This technique allowed implementation of Local Area Network distribution ports and long haul trunking ports at the same site, and allowed maximum use of the advantages of propagation at 220 MHz. Use of multiple 1.25M frequencies at a single site also allowed for frequency diversity in trunking applications while being able to stay at 220 MHz.

attempts to plan for the growing spectrum needs of the packet mode. In Southern California, the packet community created an organization specifically for the purpose of coordinating between ourselves and the recognized frequency coordinators. All of this effort had significant positive results and frequencies were made available for packet radio on a variety of bands. However, as a result of all of this, it became even more obvious that the 1.25M Band offered advantages in propagation and availability not found anywhere else.

Because of the overwhelming advantages of the 1.25M Band, expansion activities continued even after it appeared that the 220 - 222 MHz segment might not be available to Amateur Radio. Despite all of this, when August 27th, 1991 came along, packet radio in Southern California was off of the 220 - 222 MHz Band segment. Wideband test operations were forced to cease. Link operations in the lower portion of the band were either turned off or transitioned to inferior alternative frequencies. Many

tion at that frequency result in unusable circuits for many hours of the day.

USE OF 216 - 220 MHZ

VERA desires to continue its support of the development of Amateur Packet Radio and believes that adequate frequencies for use in trunking applications is the greatest immediate need. Point-to-point circuits between multi-Node HUBS will be the backbone of the system and frequencies in the 216-218 MHz Band would work well for many of those trunks. Experience in this frequency range suggests to us that interference problems with other services could be easily minimized through appropriate frequency coordination, site selection, and antenna polarization actions.

Although there is a television channel 13 operation in

COORDINATION

VERA and its members are active participants in the overall frequency coordination activities in Southern California and strongly support the concept that Amateur organizations are capable of providing the necessary coordination function proposed for application in this situation. Amateur Radio will need the Commission to stand ready to provide enforcement actions should they become necessary. This case is no different than others where Amateur Radio is expected to coordinate itself.

CONCLUSION

VERA believes that because of the adverse effects of Docket 87-14, the 1.25M band usage pressures existing in locations like Southern California, the unavailability of alternative frequencies with similar propagation characteristics, and the need to provide Amateur Radio a place in the VHF spectrum for wideband (100kHz) and narrowband trunking channels, it is important for the Commission to act favorably on the request for a secondary Amateur allocation in the 216 - 218 MHz Band.